

April 9, 2025

Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, 11-md-2262 (NRB)

Via ECF

The Honorable Naomi Reice Buchwald
 United States District Judge
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

Dear Judge Buchwald:

As liaison counsel for Plaintiffs and Defendants, and pursuant to Rule 2.E of the Court's Individual Practices and the Court's directive in its March 21, 2025 letter (ECF No. 4545), we write to respectfully request permission to file under seal (1) Defendants' consolidated Rule 56.1 statement and (2) Plaintiffs' consolidated Rule 56.1 counterstatement. The previous iterations of these materials were all filed under seal in the first instance. (ECF Nos. 4168; 4331; 4333; 4443; 4444; 4526-1; 4526-2.) The parties will also hand-deliver courtesy copies of these materials to Your Honor's Chambers tomorrow.

Consistent with Your Honor's Individual Practices, the Court's ECF Rules & Instructions, and the Court's Order dated September 27, 2024 (ECF No. 4136), the Parties are filing these consolidated Rule 56.1 materials entirely under seal and will, within 14 days, file public versions with confidentiality redactions on the public docket, as well as a second complete set of the same, with any redactions highlighted, under seal, as required by Section 6.8 of the Court's ECF Rules & Instructions.

Respectfully submitted,

/s/ Arthur J. Burke
 Arthur J. Burke

*Counsel for Bank of America Corporation and
 Bank of America, N.A., and Liaison Counsel
 for Defendants*

Application granted.
So ordered.


 NAOMI REICE BUCHWALD
 UNITED STATES DISTRICT JUDGE

Dated: April 10, 2025
 New York, New York

/s/ William Christopher Carmody
 William Christopher Carmody

*Co-Lead Counsel for the OTC Plaintiffs and
 Liaison Counsel for the Class Plaintiffs*

/s/ James Robertson Martin
 James Robertson Martin

*Counsel for the Federal Deposit Insurance
 Corporation as Receiver for 20 Banks and
 The Federal Home Loan Mortgage
 Corporation and Liaison Counsel for the
 Direct Action Plaintiffs*

cc: All counsel via ECF